

UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF
PENNSYLVANIA

CRYSTAL AURANDT, on Behalf of
Herself and All Others Similarly
Situating

Plaintiff,

v.

CAREY V. BROWN, RONALD BEAVER,
CREDIT PAYMENT SERVICES, INC.
("CPS"), MYCASHNOW.COM, INC.
("MYCASHNOW"), CREDIT PROTECTION
DEPOT, INC. ("CPD"), ACH FEDERAL, LLC
("ACH FEDERAL"), DISCOUNT
ADVANCES, INC. ("DISCOUNT ADV."),
PAY DAY MAX, LTD. ("PAYDAYMAX"),
OWLS NEST, LLC ("OWLS NEST"),
MILLENNIUM FINANCIAL CONCEPTS INC.
("MILLENNIUM"), SUPPORT SEVEN, LLC
("SUPPORT SEVEN"), AND ADDITIONAL
UNKNOWN DEFENDANTS,

Defendants

)
)
)
)
) Case No. 3:15-cv-00275 KRG
)
) JUDGE KIM R.
) GIBSON

**MOVING DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED
COMPLAINT AND TO COMPEL ARBITRATION OF ALL REMAINING CLAIMS IN
THE SECOND AMENDED COMPLAINT**

Defendants Carey V. Brown ("Brown"), Credit Payment Services, Inc. ("CPS"), MyCashNow.Com, Inc. ("MyCashNow"), Credit Protection Depot, Inc. ("CPD"), ACH Federal LLC ("ACH Federal"), Discount Advances, Inc. ("Discount Adv."), Pay Day Max, Ltd. ("Paydaymax"), Owls Nest, LLC ("Owls Nest"), Millenium Financial Concepts Inc. ("Millenium"), and Support Seven, LLC ("Support Seven") (collectively, the "Moving Defendants"), by and through their undersigned counsel, hereby move, pursuant to Federal Rule

of Civil Procedure 12, to dismiss the Second Amended Complaint and to compel arbitration of *all* remaining claims in the Second Amended Complaint.

Dated: May 5 , 2017

Respectfully submitted,

INMAN FLYNN BIESTERFELD &
BRENTLINGER, P.C.

BY: /s/ James M. Lord

James M. Lord (admitted *Pro Hac Vice*)

Colorado Bar No. 40747

INMAN FLYNN BIESTERFELD &
BRENTLINGER, P.C.

1800 Gaylord Street

Denver, CO 80206

Tel: (303) 861-5300